

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	
	:	
-v.-	:	DECLARATION IN SUPPORT
	:	OF FINAL ORDER OF
BARRY CONNELL,	:	<u>FORFEITURE</u>
	:	
	:	17 Cr. 116 (VM)
	:	
Defendant.	:	
	:	
	:	
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Kiersten A. Fletcher, pursuant to Title 28, United State Code, Section 1746,  
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the Office of Audrey Strauss, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's submission for the entry of a Final Order of Forfeiture in the above-captioned case.

2. On or about January 31, 2020, this Court entered a Consent Preliminary Order of Forfeiture as to Specific Property/Money Judgment (the "Preliminary Order of Forfeiture") (D.E. 65) with respect to BARRY CONNELL (the "Defendant"), imposing a money judgment in the amount of \$5,141,699.19 in United States currency against the Defendant, and forfeiting to the United States all right, title and interest of the Defendant in all of the specific property listed in Schedule A as attached to the Preliminary Order of Forfeiture (the "Specific Property").

3. The Notice of Forfeiture and the intent of the Government to dispose of the Specific Property was posted on an official government internet site ([www.forfeiture.gov](http://www.forfeiture.gov))

beginning on November 14, 2020 for thirty (30) consecutive days, through December 13, 2020, pursuant to Rule G(4)(a)(iv)(C) of the Supplemental Rules for Admiralty and Maritime Claims and Asset Forfeiture Actions, and proof of such publication was filed with the Clerk of the Court on January 8, 2021 (D.E. 86).

4. On or about May 1, 2020, Lisa Connell directed a letter to this Court asserting an interest in some of the items listed in the Specific Property (the “Connell Claim”).

5. On or about February 11, 2021, this Court entered a Stipulation and Order in which the Government agreed to release to Lisa Connell certain items listed in the Stipulation and Order from among the Specific Property (the “Released Items”) (D.E. 88).

6. Since final publication of the Notice of Forfeiture, thirty (30) days have expired and no petitions or claims to contest the forfeiture of the Specific Property except the Connell Claim have been filed.

7. The Defendant and Lisa Connell are the only persons and/or entities known by the Government to have a potential interest in the Specific Property.

8. All of the Released Items have been disposed of, leaving the following items subject to final forfeiture to the United States:

- a. 3 Pieces of hand painted pottery
- b. 1 Seth Thomas mantle clock, glass case
- c. 1 Oak base to antique wall phone
- d. 1 Black iron railroad lamp
- e. 1 Baccarat collectible liquor bottle
- f. 1 Pair Valentine 6"; size 36; white patent leather lilac trim with studs
- g. 1 Pair Givenchy spectator style heels with, metal heel; size 36
- h. 1 Pair Christian Dior zipper back 6 inch heel, size 36
- i. 1 Pair Valentino, grey with lilac trim and studs; size 36
- j. 1 Pair Nude patent leather Christian Louboutin; size 36
- k. 1 Pair Stuart Weitzman faux gator pattern slip on shoes, size medium

- l. 1 Pair Christian Dior patent leather Navy boots size 36
- m. 1 Pair Givenchy men's black leather buckle boots, size 44; new condition
- n. 1 Valentino cross body bag, mustard color, gold hardware accents red dust cover
- o. 1 Givenchy black leather belt with silver trim, white dust bag
- p. 2 pairs men's dress shoes
- q. 3 pairs men's dress shoes
- r. 1 Givenchy after 5 black velvet handbag with accents
- s. 1 Pair Christian Dior brown leather gloves
- t. 1 Christian Dior sunglasses with red trim case and tag
- u. 1 Christian Dior wrap with blue pattern, silver hardware and jewel accents
- v. 3 Men's designer ties; 2) Givenchy and 1 Dior
- w. 1 Dior black leather jacket with double zippers
- x. 1 Givenchy black mink zip up jacket with leather trim, size 36
- y. 1 Dior women's white jacket with dust bag
- z. 1 Givenchy ladies black sequin tuxedo jacket with satin trim includes dust jacket
- aa. 1 Chanel black jacket with nepal collar, button down, size 36
- bb. 1 Givenchy women's "Coat Dress"
- cc. 1 Barbara Bui white wool women's blazer
- dd. 1 Christian Dior women's mauve dress with sequin accents, size 2
- ee. 1 Givenchy men's black pinstripe suit, with pants and coat
- ff. 1 Givenchy black wool men's suit, with coat and pants
- gg. 1 Dior black ladies skirt, size 2
- hh. 2 Givenchy men's suit coats; 1-Black; 1-Navy
- ii. 1 Givenchy black evening dress size 36
- jj. 1 Givenchy black leather skirt, size 38
- kk. 1 Givenchy black slip dress with reptilian pattern
- ll. 1 Givenchy white vest blouse, size 36
- mm. 6 Pieces of assorted women's designer clothing; Givenchy, Louis Vuitton, Burberry, Barbara Bui
- nn. 1 Givenchy black jumpsuit, size 36
- oo. 1 Givenchy black sweater with silver tone chain hardware, size XS
- pp. 1 Alexander McQueen cream color dress size 40
- qq. 1 Christian Dior cream color "coat dress" minor soiling size 4
- rr. 3-Pairs women's jeans (2 mauve)
- ss. 8 Assorted style and color Men's Givenchy dress shirts
- tt. 4 Givenchy men's calf leather accessories carriers
- uu. 1 Pair Givenchy black leather boots with heels, open toes size 36
- vv. 1 pair women's linen pants
- ww. 1 pair of Louboutin
- xx. 1 White Chanel purse with dust bag
- yy. 1 Mustard Chanel purse with dust bag

- zz. 1 pair of Brum Magli shoes
- aaa. 1 pair of diamond earrings with an appraisal document from Jewel Trendz
- bbb. 1(14kt) white gold ladies diamond ear studs, martini set
- ccc. 1 10 Karat white gold chain necklace
- ddd. 1 set Dune Jewelry men's cufflinks with presentation box
- eee. 10 bottles of Wine 2012 Taylor Family Vineyard Cabernet Sauvignon Reserve Napa Valley
- fff. 17 bottles of Wine 2012 Taylor Family Vineyard Camulus Napa Valley Cabernet Sauvignon 750ml
- ggg. 6 bottles of Wine 2013 Taylor Family Vineyard Cabernet Sauvignon Atlas Peak Napa Valley
- hhh. 5 bottles of Wine 2012 Empreinte Cabernet Sauvignon Napa Valley St. Helena Martinez Vineyard 750ml.
- iii. 6 bottles of Wine 2012 Nicholson Jones Cabernet Sauvignon Napa Valley Sugarloaf Mountain Vineyard.
- jjj. 24 bottles of Wine 2014 B Cellars Sangiovese Napa Valley Bottled April 8, 2016
- kkk. 134 bottles Unfiltered
- lll. 2 bottles of Wine 2004 Renteria Napa Valley Cabernet Sauvignon Stags Leap District 1.5L Magnum
- mmm. 3 bottles of Wine 2014 Taylor Family Vineyard Hillside Chardonnay Oak Knoll District Napa Valley
- nnn. 8 bottles of Wine 2012 Promise Cabernet Sauvignon Rutherford Napa Valley 750ml
- ooo. 3 bottles of Wine 2011 B Cellars Blend 24 (Cab 68%, Sangiovese 24%, Petite Sirah 8%) Napa Valley.
- ppp. 27 bottles of Wine 2012 Promise O Rutherford Napa Valley Cabernet Sauvignon. 1.5ml Magnum (Black label state)
- qqq. 9 bottles of Wine 2012 Sabina Vineyards Reserve Napa Valley 750ml.
- rrr. 2 bottles of Wine 2012 Sabina Vineyards Pinot Noir Willamette Valley. 750ml
- sss. 10 bottles of Wine 2014 King Richard's Reserve Pinot Noir Russian River Valley Fantasca Estate and Winery 9
- ttt. 13 bottles of Wine 2007 Renteria Tres Perlas Napa Valley Cabernet Sauvignon 1.5ml Magnum
- uuu. 23 bottles of Wine 2013 Promise The Love Pinot Noir Russian River Valley Sonoma County 750ml
- vvv. 6 bottles of Wine 2012 Azur Napa Valley Cabernet Sauvignon 750ml
- www. 40 bottles of Wine 2015 Promise The Joy Rosé 750ml

(a. through www., collectively, the "Forfeitable Property").

9. Accordingly, the Government requests that the Court enter the proposed Final Order of Forfeiture.

10. No previous application for the relief requested herein has been sought.

Dated: New York, New York  
August 18, 2021

AUDREY STRAUSS  
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By: \_\_\_\_\_

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